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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO: CR 15-518 RS
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME AND
)	[PROPOSED] ORDER
v.)	
)	
ROBERT JACOBSEN,)	
)	
Defendant.)	
)	
)	

The parties request that the time between May 3, 2016, and July 26, 2016, be excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B). The government has produced discovery to defendant. Defense counsel is investigating a possible conflict. Excluding time until July 26, 2016 will allow for the effective preparation and continuity of counsel, and the ends of justice served by this delay outweigh the defendant's and the public's interest in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(B)(ii).

IT IS SO STIPULATED.

DATED: May 10, 2016

/s/
BENJAMIN KINGSLEY
Assistant United States Attorney

DATED: May 10, 2016

/s/
STEVE KALAR
Counsel for Defendant Robert Jacobsen


STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER

~~PROPOSED~~ ORDER

The Court finds that the exclusion of the period from March 3, 2016, and July 26, 2016 from the time limits applicable under 18 U.S.C. § 3161, is warranted; that the ends of justice served by the continuance outweigh the interests of the public and the defendants in the prompt disposition of this criminal case; and that the failure to grant the requested exclusion of time would deny counsel for defendant the reasonable time necessary for effective preparation and of counsel, taking into account the particular complexity of the case and the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(B)(ii).

IT IS SO ORDERED.

DATED: 5/10/16


HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE